

Department of Energy

Ohio Field Office Fernald Closure Project 175 Tri-County Parkway Springdale, Ohio 45246 JUL 2 4 2006



DOE-0171-06

Mr. James A. Saric, Remedial Project Manager United States Environmental Protection Agency Region V-SRF-5J 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Mr. Thomas Schneider, Project Manager Ohio Environmental Protection Agency Southwest District Office 401 East Fifth Street Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

CONTRACT DE-AC24-010H20115, TRANSMITTAL OF OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE SILOS AREA NATURAL RESOURCE RESTORATION DESIGN PLAN, FINAL, REVISION 0

References: 1) Letter, T. Schneider to J. Reising, "OEPA Comments on the Silos Area Natural Resource Restoration Design Plan, Final, Revision 0", dated May 15, 2006

- Letter, J. Reising to J. Saric and T. Schneider, "Transmittal of the Silos Area Natural Resource Restoration Design Plan, Final, Revision 0", dated March 31, 2006
- 3) Letter, J. Saric to J. Reising, "Ohio Environmental Protection Agency Comments on the Silos Area NRRDP, Final, Revision 0", dated May 15, 2006

Enclosed are responses to Ohio Environmental Protection Agency comments on the Silos Area Natural Resource Restoration Design Plan

If you have any questions or require additional information, please contact me at (513) 648-3139

Sincerely

knny W. Reising

Director

Enclosure: As Stated

Mr. Thomas Schneider

cc w/ enclosure:

- J. Desormeau, DOE-OH/FCP
- G. Stegner, DOE-OH/FCP
- C. Jacobson, Stoller
- M. Lutz, Stoller
- M. Miller, Stoller
- J. Powell, DOE-LM/FCP
- M. Cullerton, Tetra Tech
- S Helmer, ODH
- G. Jablonowski, USEPA-V, SR-6J
- D. Sarno, FCAB
- T. Schneider, OEPA-Dayton (three copies of enclosures)
- M. Shupe, HSI GeoTrans

cc w/o enclosure:

- J Chiou, Fluor Fernald, Inc./MS88
- J. Homer, Stoller, MS12
- F. Johnston, Fluor Fernald, Inc./MS12
- U Kumthekar, Fluor Fernald, Inc /MS88
- L. McHenry, Stoller, MS12
- P. Mohr, Fluor Fernald, Inc./MS1
- J Schwing, Fluor Fernald, Inc /MS90
- H Swiger, Stoller, MS12
- T Terry, Fluor Fernald, Inc./MS1
- S. Walpole, Stoller, MS76
- J Williams, Fluor Fernald, Inc./MS60

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE SILOS AREA NATURAL RESOURCE RESTORATION DESIGN PLAN, REVISION 0, FINAL

FERNALD CLOSURE PROJECT FERNALD, OHIO

JULY 2006

U.S. DEPARTMENT OF ENERGY

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE SILOS AREA NATURAL RESOURCE RESTORATION DESIGN PLAN

COMMENTS:

1. Commenting Organization: Ohio EPA Commenter: OFFO

Section #: General Pg #: NA Line #: NA Code: C

Original Comment #: 1

Comment: It is unclear how this project is being integrated with the ongoing design efforts by UC to

develop the MUEF. The plan should be revised to specifically point out issues of coordination and hold points for incorporation of UC concepts. An example of this might include how the proposed wetland treatment system would be incorporated into the surrounding restoration. Or how the proposed parking lot could be developed in a more environmentally friendly way with less impervious surface and heat signature. Similarly the figures show trail heads at the MUEF location but do not extend those trails into the

figures show trail heads at the MUEF location but do not extend those trails into the restoration areas. It would be inappropriate and wasteful to conduct restoration activities that would limit the MUEF design or need to be destroyed to make way for MUEF design. A

more clear approach to integration is needed.

Response: The facilities and infrastructure that will remain post-closure for the Multi-use Educational

Facility (MUEF) have been incorporated into the Silos Natural Resource Restoration Design Plan (NRRDP). Grading activities were minimized in order to give the MUEF design team a

"clean slate" from which to work.

Action: No action required.

2. Commenting Organization: Ohio EPA Commenter: OFFO

Section #: 1.0 Pg #: 1-1 Line #: NA Code: C

Original Comment #: 2

Comment: The document states that DOE's approach for "ecological restoration" at Fernald are

outlined in the Natural Resource Restoration Plan (DOE 2002) and that the Silos Area will be "consistent with the sitewide restoration goals." What this document fails to point out is that the NRRP has not been finalized nor approved by the Agencies. Therefore, any

restoration projects cannot yet be considered complete.

Response: DOE acknowledges the comment.

Action: No action required.

3. Commenting Organization: Ohio EPA Commenter: OFFO

Section #: 3.1.1 Pg #: 3-1 Line #: NA Code: C

Original Comment #: 3

Comment: In case the Silos Treatment Pad and Tank Transfer Pad cannot be established clean and the

pads must be removed, DOE suggests that 'additional wetland acreage could be created" within the pad's footprint. However, DOE should have a backup contingency plan in place and ready for the Agency's review should a new wetland need to be developed in the pad's

footprint.

Response: DOE agrees with the comment.

Action: DOE will present a contingency plan if all or a portion of the pads must be removed.

4. Commenting Organization: Ohio EPA Commenter: DSW

Section #: 4.2 Pg #: 4-2 Line #: NA Code: C

Original Comment #: 4

Comment: It is stated that "The slopes of the basins will be graded to no more than 5:1". It is assumed

that this means the side slopes. Side slopes are preferred to have as shallow a slope as possible, with at least one side being approximately 15:1. Likewise, the bottom of wetland basins should have a gentle slope rather than being sharply sloping or completely flat.

Response: Restoration grading in the Silos NRRDP is consistent with previous restoration designs at

the Fernald site. Slopes will be reduced as much as possible in the field, given the footprint

of the land that is available.

Action: No action required.

5. Commenting Organization: Ohio EPA Commenter: DSW

Section #: Sheet G-10 Pg #: NA Line #: NA Code: C

Original Comment #: 5

Comment: Soil amendment appears to end north of where additional amendment is needed. From the

southernmost point of the project, north and east is currently roads, parking, and a trailer.

This area should also receive soil amendment.

Response: DOE agrees with the comment.

Action: Soil amendments will be applied where needed. These decisions will be made in the field.

6. Commenting Organization: Ohio EPA Commenter: DSW

Section #: Sheet G-10 Pg #: NA Line #: NA Code: C

Original Comment #: 6

Comment: Although not directly part of this project, it appears as though the access road to the well by

the arsenic removal area is not included on these drawings. Will that access road be placed along the southeast boundary of this project or will it be placed elsewhere? If elsewhere, will the continuity of the pilot plant drainage ditch be restored (i.e., the road and culvert

removed to daylight the stream)?

Response: A gravel road will remain southeast of the project area in order to access EW-26 (adjacent to

the arsenic removal area). Therefore, the Pilot Plant drainage ditch culvert will remain.

Action: No action required.

7. Commenting Organization: Ohio EPA Commenter: DSW

Section #: 4.3.2 & drawings Pg #: 4-4 Line #: NA Code: C

Original Comment #: 7

Comment: This restoration includes drainage from the former Silos footprint to Paddys Run and

stabilization of the Paddys Run bank in the Silos area. No detail is given other than to state that riprap will be used to stabilize the bank and use of bioengineering techniques will be used when practicable. Detail in both the narrative and drawings is needed to show the flow

from the Silos footprint to Paddys Run and the stabilization that will be used.

Response: Stabilization of the east bank of Paddys Run has been discussed in concert with the grade

control structure installations included in the Waste pits NRRDP. Based on the walk-down with representatives of the Ohio Environmental Protection Agency and the Ohio Department

of Natural Resources on July 5, 2006, a revised path forward for this area has been

established.

Action: No action required.

8. Commenting Organization: Ohio EPA Commenter: DSW

Section #: 5.0 Pg #: 5-1 Line #: NA Code: C

Original Comment #: 8

Comment: Monitoring description is insufficient. Monitoring should be at least two years for plant

survival. Monitoring requirements should follow the final approved version of the NRRP.

Response: DOE acknowledges the comment.

Action: No action required.

9. Commenting Organization: Ohio EPA Commenter: DSW

Section #: Appendix A Pg #: NA Line #: NA Code: C

Original Comment #: 9

Comment: The addition of the coefficients of conservatism to the plant list would be welcomed. Since

the publication of the list for all of Ohio has been available for some time, adding this to the

lists is desirable.

Response: Information on the plant list is minimized for readability within the text (so that it will fit

easily on one page). Additional information on the plants used for restoration at the

Fernald site is available upon request.

Action: No action required.